



July 7, 2014

Carl Nadela, AICP, Regional Planner
Los Angeles County Department of Regional Planning
320 W. Temple Street, Room 1356
Los Angeles, CA 90012
Email: tnc@planning.lacounty.gov

**RE: Notice of Preparation for Los Angeles County Antelope Valley Areawide
General Plan Update (AVAP)**

Dear Mr. Nadela:

The Endangered Habitats League (EHL) appreciates the opportunity to comment on this project. For your reference, EHL is Southern California's only regional conservation group.

EHL first wishes to voice its strong support for the expanded Significant Ecological Areas (SEAs) that are proposed¹. These are a foundation for the future of the County and are the repository of the citizens' natural heritage.

"Smart growth" planning reduces the land consumed for development, reduces GHG emissions, and protects natural resources while accommodating population and job growth. We therefore support a framework of Town Centers and Rural Preserve Areas. Contingent upon location, Economic Opportunity Areas (EOAs) also make sense. Our comments focus on how to implement these goals.

Due to a long history of large lot parcelization in the Antelope Valley, achieving the town and preserve framework will be challenging. Even where lands are rezoned to 1 unit per 20 acres, this will be insufficient to protect the biological values of the most important preserve areas, that is, the Significant Ecological Areas (SEAs). Such densities, on top of existing parcelization, create habitat fragmentation and edge effects incompatible with maintaining existing biological values. (See enclosure, documenting adverse impacts beginning roughly at 1:40.) In addition, the EOAs as proposed will cause significant growth induction along highway infrastructure, which would obviate the goal of community separation via rural preserves.

We therefore request that the Antelope Valley Update and its EIR contain four measures to address the adverse impacts of development and to achieve the goal of

¹ When determining the compatibility of the proposed AVAP with an affected SEA, it would make sense to consider the unique and exceptional circumstance of the Tejon Ranch Land-Use and Conservation Agreement, which in effect clusters development on a larger scale, albeit with some of the resulting ecological benefit occurring on the other side of a jurisdictional boundary.

preserves. Where possible, these should be included in the AVAP as feasible *mitigation measures* for the reduction of biological and other impacts, allowing subsequent, expeditious tiering by future development during CEQA review.

Reduced densities in environmentally constrained land

As you consider the framework for land use, we urge that land use designations—and the densities therein—fully reflect infrastructure, public safety, and environmental constraints. It costs the taxpayer to provide services, utilities, roads, and police and fire protection to more distant locations. Often, such areas have high wildlife values, including but not limited to Significant Ecological Areas (SEAs). These same areas typically have high fire hazard. Reducing density automatically puts less life and property at risk of fire and, during a fire event, ensures that limited fire-fighting resources are spent stopping the fire's spread rather than defending dispersed home sites that should not have been built in the first place.

Therefore, outside of urban centers and EOAs, densities should be Rural, preferably at the RL40 category but at RL20 or RL10 where existing patterns of parcelization preclude the lowest density category². *Within SEAs, it is particularly vital to retain the RL40 densities that were changed in the most recent draft map to RL20.* But in any case, RL40 within SEAs and other habitat areas must be analyzed in the DEIR as part of an Environmentally Superior alternative. Estate and ranchette designations (H2, R1, R2, and R5) rarely support agricultural uses and are the epitome of inefficient, auto and GHG-intensive, and land-consumptive land use. Such categories should only be used when existing parcelization has already converted an area to “rural sprawl.”

By down-planning estate densities to rural categories, the County of San Diego found billions of dollars in taxpayer savings³ and will avoid putting life and property at risk of wildfire. Los Angeles County should follow suit, and focus growth at higher densities in appropriate locations.

Transfer of development rights (TDR)

In order to protect the natural resource value of SEAs, Los Angeles County needs an effective strategy in addition to traditional acquisition and to the mechanisms (e.g., set asides, mitigation) in the SEA Ordinance. This is particularly the case in the Antelope Valley, where scattered estate and ranchette subdivision is the norm, rather than large development projects that can more effectively concentrate density and preserve open space through site design.

² The unique circumstance of the Tejon Ranch Land-Use and Conservation Agreement may justify an exception to an RL designation because the Agreement effectively concentrates urban development on a small portion of its holdings, facilitating conservation over vast areas.

³ The San Diego County General Plan Update EIR found savings of \$1.6 billion in road construction costs alone, irrespective of ongoing maintenance. Also see http://www.sdcountry.ca.gov/pds/docs/bos_may03_report.pdf at page 21, Public Costs, for comparison of municipal vs unincorporated service costs.

TDR is a proven mechanism to preserve open space and one that creates positive outcomes for property owners who sell development rights and those who acquire them. It gives economic value to the open space that the public desires. TDR may be of the classic variety⁴ or streamlined as a fee program. The latter would require payment of an open space fee as a condition of obtaining density and would allow the agency receiving the fees to effectively prioritize conservation properties. TDR should always use the post-Update, rezoned density as baseline for sending areas and should require participation by receiving sites not only to increase density above a baseline (bonus density) but also to attain plan density (at least beyond the lower end of the density range). Coordination with nearby cities would be ideal.

Because it shifts growth from more remote and habitat-rich lands to locations closer to jobs and services, TDR could be incorporated into the EIR as mitigation for impacts to biological resources, traffic, GHG, aesthetics, etc. We recommend retaining an experienced consultant to explore options and fashion a program.

Site design

In order to implement biologically sound site design during the land use process, the AVAP should “decouple” lot size from density. This allows development to be consolidated on smaller lots in the last sensitive portion of the site. To maintain community character in non-urban locations, a minimum lot size of ½-acre should be set, as it has in many rural San Diego communities.

Such consolidation of development should be *mandatory* at the Rural designations of RL5 - RL40, and should be used in the EIR as a key *mitigation measure* for biological, public safety, agricultural, and other impacts. The land set aside through such a subdivision could serve habitat or agricultural purposes but could not be developed in the future. An “off the shelf” model that provides standards, guidelines, and allowable uses (including agriculture) in the resulting open space is San Diego County’s Conservation Subdivision Program⁵.

Growth policies

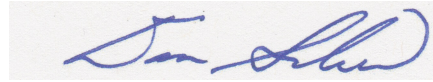
Economic Opportunity Areas (EOAs) that concentrate jobs and housing and provide improvements in services and transportation and water and sewerage infrastructure are growth inducing. As a mitigation measure, it is thus essential that the AVAP include protections against the sprawl that would otherwise follow such development, particularly along highway corridors. The most worrisome case is Highway 138. EHL recommends an urban growth boundary around EOAs or at a minimum a land use policy that prohibits extension of urban services between the proposed West and Central EOAs absent another comprehensive update of the AVAP.

⁴ For example, see the City of Livermore’s program at <http://www.cityoflivermore.net/civicax/filebank/documents/3051/>.

⁵ See <http://www.sdcountry.ca.gov/pds/advance/conservationsubdivision.html>.

EHL looks forward to continuing to work with the County of Los Angeles on a successful Update.

Yours truly,

A handwritten signature in blue ink, appearing to read "Dan Silver", is centered on a light gray rectangular background.

Dan Silver
Executive Director

Enclosure: Conservation Biology Institute, *Analysis of General Plan-2020 San Diego County*, December 2005